



August 29, 2022

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VIA ECF

Honorable Cathy Seibel
United States District Court
Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

Re: *E. & J. Gallo Winery v. Freixenet Mionetto USA et al.*
Civil Action No. 7:22-cv-03878
Extension of Time to Answer for Defendants Freixenet Mionetto USA, Inc.
and CL Direct Imports
Our File No. 23207.00003

Dear Judge Seibel:

As you may recall, this firm represents Defendants Freixenet Mionetto USA, Inc. and CL Direct Imports (collectively “Freixenet”) in connection with the above-captioned litigation.

On July 11, 2022, Freixenet was served with a copy of the Complaint and a response was due by August 1, 2022. *See*, Dkt. Nos. 17, 18. With the consent of Plaintiff’s counsel, Freixenet has requested two brief extensions of time to answer or otherwise respond to the Complaint, which the Court granted. *See*, Dkt. Nos. 21, 23, 26, 27.

Again with the consent of Plaintiff’s counsel, we write to respectfully request that the Court grant Freixenet an additional fifteen days, until September 13, 2022, to answer or otherwise move with respect to the Complaint.

Thank you for your attention to this matter.

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

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ARB:jm
cc: All counsel via ECF

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